

KTF:SP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MAYSON CERVANTES,

Defendants.

COMPLAINT

(21 U.S.C. §§ 952(a) and 960)

No. 24-MJ- 464

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EASTERN DISTRICT OF NEW YORK, SS:

JOSHUA ABBENSETTS, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about July 9, 2024, within the Eastern District of New York and elsewhere, the defendant MAYSON CERVANTES did knowingly and intentionally import one or more controlled substances into the United States from a place outside thereof, which offense involved a substance containing gamma-butyrolactone ("GBL"), a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the United States Department of Homeland

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Security, Homeland Security Investigations (“HSI”) and have been involved in the investigation of numerous cases involving drug trafficking, including those involving the trafficking of GBL and other controlled substances. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. On or about July 9, 2024, at approximately 6:15 A.M., the defendant arrived at Terminal 4 at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Delta Airlines Flight DL 254 from Bogota, Colombia.

3. During the screening process as part of the defendant’s entry into the United States, officers with the United States Customs and Border Protection (“CBP”) approached the defendant MAYSON CERVANTES who was in possession of one green suitcase. CBP officers asked CERVANTES whether the green suitcase belonged to him, and CERVANTES answered affirmatively. CBP officers also asked if CERVANTES was aware of all the items contained in the green suitcase, and CERVANTES responded affirmatively. CBP officers then searched the green suitcase and found four large bottles containing clear liquid and a gray Centrum brand vitamin container with bright pink pills inside. The clear liquids were tested with a chemical analyzer and tested positive for GBL, which is typically used as a party drug or “date-rape” drug. The pink pills also field tested positive for methylenedioxymethamphetamine (“MDMA”), commonly referred to as “ecstasy.”

4. The total approximate weight of the GBL in the defendant MAYSON CERVANTES’ possession was 5.1597 kilograms.

5. Subsequently, HSI agents responded, and the defendant MAYSON CERVANTES was placed under arrest.

6. After being provided with Miranda warnings, the defendant MAYSON CERVANTES acknowledged that he knew that the substance inside the bottles was GBL. CERVANTES also told the HSI agent that he uses GBL and that he obtained the GBL from a man in Colombia at a club to use in the United States.

WHEREFORE, your deponent respectfully requests that the defendant MAYSON CERVANTES be dealt with according to law.



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JOSHUA ABBENSETTS  
Special Agent  
United States Department of Homeland Security,  
Homeland Security Investigations

Sworn to before me this  
10<sup>th</sup> day of July, 2024

*S/ Taryn Merkl*

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HONORABLE TARYN A. MERKL  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK